

1 THE HONORABLE MARSHA J. PECHMAN
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13 UNITED STATES DISTRICT COURT
14 WESTERN DISTRICT OF WASHINGTON
15 AT SEATTLE

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17 MATTHEW ADKISSON, an individual,
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19 Plaintiff,

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21 v.
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23 EPIK HOLDINGS, INC., a Washington
24 Corporation; EPIK INC., a Washington
25 Corporation; MASTERBUCKS LLC, a
26 Wyoming company; ROBERT W.
27 MONSTER, an individual; and BRIAN
28 ROYCE, an individual,
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30 Defendants.
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33 No. 2:23-cv-00495 MJP
34 DECLARATION OF DEREK PETERSON
35

36 I, Derek Peterson, declare:

37 1. I am the Chief Executive Officer of The Providence Post.

38 2. Beginning in or around early 2023, I began seeing numerous posts and consumer
39 complaints regarding Epik accepting payment to register or renew domain names, but then Epik
40 would not actually register or renew the domain name. I decided to test this out for myself. On
41 May 1, 2023, I went to Epik.com to purchase the domain name <epikcrimes.com>. I paid for the
42 domain name using Epik's website with the cryptocurrency Ethereum (\$USDC), transferring a
43 value of \$10.00 in Ethereum to Epik. A screenshot I took confirming this transaction is below.
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19 Your payment of \$10.00 in USDC has been completed.

Order Number FYWKJWDD
Amount Sent 10 USDC
\$10.00
Network Ethereum
Order Completed May 01, 2023, 18:40 (UTC)
Exchange Rate 1.00 USD/USDC

Save on fees for next time

Network fees on Polygon are much lower than on Ethereum.
Convert your crypto in the Coinbase app and save on your next purchase.



[Learn more](#)

3. I then received a receipt stating: “This confirms your recent purchase on Epik” for the <epikcrimes.com> domain name, and confirming Epik’s receipt of my payment, as shown in the screenshot I captured below.

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Epik.com | Domains | Products | Services | Marketplace Legendary Customer Support: 737-530-3745

epik Building Domains. Building Markets.

Hello Derek Peterson,

This confirms your recent purchase on Epik:

DESCRIPTION	AMOUNT (USD)
Create domain epikcrimes.com for 1 year(s)	9.99
TOTAL:	9.99 USD

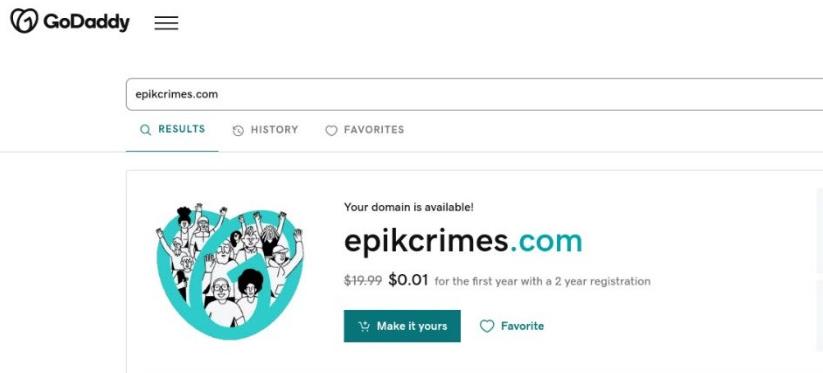
A PDF receipt is attached for your convenience and is also saved online in your Account under Account --> Payment Settings.

We appreciate your business. If you have any questions, please contact us.

Sincerely,
Epik.com Team
Email: support@epik.com
Tel: 737-530-3745

Email: info@epik.com
Website: www.epik.com
Tel: 737-530-3745

4. However, despite that Epik accepted my payment, Epik did not register the domain name for me. In fact, the domain name was still publicly listed for sale, as shown in the screenshot below which I captured after I purchased the <epikcrimes.com> domain name.



5. As of May 26, 2023, the <epikcrimes.com> domain name, which I paid Epik to
6 register, is owned by a third party using a different registrar. I do not own or control the
7 <epikcrimes.com> domain name, and Epik has not refunded me my payment for the domain
8 name.

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25 **I declare under penalty of perjury that the foregoing**
26 **is true and correct.**

27 EXECUTED this 26th day of May, 2023.
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DocuSigned by:

Derek Peterson
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